

EXHIBIT 1

**Plaintiffs' More Definite Statement as to
Defendant Habib Bank Ltd.**

1. Plaintiffs hereby incorporate all allegations and counts contained in the Third Amended Complaint in Burnett, et al. v. Al Baraka Investment and Development Corp., et al., 03 MD 1570 (RCC), 03 CV 5738 & 03 CV 9849, including all of the allegations and claims contained therein.

Organizational Structure and Purpose of Habib Bank Ltd.

2. Habib Bank AG Zurich, incorporated in Switzerland ("Habib Bank"), is a Pakistani financial institution and banking corporation established under the laws of Pakistan doing business in the United States through offices located in New York City at the following address: Habib Bank Limited, 60 East 42nd Street, Suite 530, New York, New York 10165.

3. Habib Bank also has a branch located at 110 East 9th Street, Los Angeles, California 90079-1300.

4. Habib Bank handles a trade flow of over \$3 billion USD, which is around 18% of the total trade flow of Pakistan.

5. Habib Bank has long been scrutinized by U.S. intelligence officials monitoring terrorist money flows.

6. Habib Bank held accounts of Al Rashid Trust, Specially Designated Global Terrorist ("SDGT") since September 24, 2001.

7. Habib Bank held accounts of the International Islamic Relief Organization ("IIRO").

8. The IIRO is one of the chief Saudi charities definitively linked to financing a variety of international terrorist groups.

9. Habib Bank facilitated financial transfers of the al Qaeda cell in Madrid, Spain.

10. Information provided by the Iraqi government to the United Nations Special Commission (UNSCOM) demonstrates that Habib Bank was the correspondent bank on one or more letters of credit obtained by Saddam Hussein's regime in connection with the purchase of goods and/or services that were used to acquire and/or produce chemical weapons of mass destruction.

11. An October 2001 U.S. military raid on Darunta – the former al Qaeda terrorist training camp in Afghanistan – uncovered a document detailing a money transfer requesting that a London branch of Pakistan's Habib Bank AG Zurich credit the account of an individual identified as Moazzam Begg in Karachi for an unspecified sum of money.

12. Moazzam Begg has been placed on the U.S. Military Tribunal docket list for prosecution.

13. The Darunta terrorist training camp was a Soviet military base before becoming an Osama Bin Laden terrorist training camp for al Qaeda.

14. The materials found at the Darunta terrorist training camp demonstrate al Qaeda's chemical weapons capability.

15. A laboratory found at the Darunta terrorist training camp contained lead acetate, nitric acid, carbolic acid and glycerin, all of which are highly toxic. Chemical formulas for sarin were also found.

16. A drawer in the Darunta terrorist training camp laboratory contained three manuals: 1. An 18-chapter, 179-page training book written by Osama bin Laden operatives identifying "buildings, bridges, embassies, schools, (and) amusement parks" as targets for destruction in the West; 2. *Middle Eastern Terrorist-Bomb Designs* (Paladin Press, USA, May,

1993), printed in the USA; and 3. *Guerilla's Arsenal: Advanced Techniques for Making Explosives and Time-Delay Bombs* (Paladin Press, USA, January, 1994), printed in the USA. Additionally, 84 pages of bomb-building techniques involving dynamite and C3 and C4 plastic explosives appear to have been downloaded from the Internet.

17. A money transfer check via Habib Bank to Sheikh Salah in Pakistan for \$1,046.00 USD (Check Number 385848) was signed on November 4, 1996 and presented to Bank Habib Limited of Peshawar, Pakistan. The bill was then presented to American Express Bank of New York, which made it go to First Chicago International and co-responsible party Cajamadrid. The payment was made in full on June 3, 1996. The address of the institution where the check was cashed is Habib Bank Limited, Head Office, International Division, 17 Habib Bank Plaza, Karachi, 21, Pakistan.

18. Salah traveled to Peshawar, Pakistan, to act as a point man for al Qaeda's worldwide recruitment efforts.

19. Recruits were sent to Salah in Peshawar, and then on to training camps controlled by Osama Bin Laden, and to other camps in Bosnia and Indonesia.

20. Sheikh Salah (a/k/a Anwar Adnan Mohamed Salah) was once the leader of the al Qaeda cell in Madrid, Spain.

21. Salah's al-Qaeda responsibilities included the indoctrination of young worshippers by obtaining propaganda material from fundamentalist groups in Algeria, Egypt, Afghanistan and the Palestinian territories "and distributing them at the Abu Bakr mosque" in Madrid.

22. The Abu Bakr mosque became prominent in the process of affiliation to the jihad.

23. The "Soldiers of Allah" took over Madrid's Abu Bakr mosque in 1994.

24. The local group of Muslim extremists that carried out the Madrid attack on March 3, 2004 was inspired by al Qaeda.

25. The Abu Bakr mosque was one of the places of worship attended by the bombing suspects of the March 3, 2004 terrorist attack in Madrid, Spain carried out by Muslim extremists that killed nearly 200 people in Madrid, Spain.

26. A November 16, 2001, raid on a suspected al Qaeda base in Kabul, Afghanistan uncovered a check (Account No. 90280-04) drawn on Habib Bank Limited, Peshawar, Pakistan.

27. The same November 16, 2001 raid also uncovered a page torn from a flying magazine with flight training ads, a map of Afghanistan, packaging from a copy of Microsoft Flight Simulator98, detailed notes written both in Arabic and English and other documents.